

11911501

WWT P. FILE

EPA Region 5 Records Ctr.



360714

Amoco Oil Company200 East Randolph Drive
Post Office Box 6110-A
Chicago, Illinois 60680**February 28, 1984**Certified No. 454 431 169Return Receipt Requested

Mr. Larry Eastep, P.E.
Manager, Permit Section
Division of Land Pollution Control
Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Dear Mr. Eastep:

RCRA Closure of Facilities at Amoco's Wood River Wastewater Treating Plant--EPA ID No. ILD006272629

As you are aware, Amoco Oil Company has donated its wastewater treating plant in Wood River to the City of Wood River. Prior to the actual assumption of operation of the plant by the City, we want to clarify its status, vis a vis, the Resource Conservation and Recovery Act (RCRA). Our plant was listed on our RCRA, Part A, application because, at that time, it generated, stored, and treated dissolved air flotation (DAF) float from petroleum refining, a waste listed as hazardous by the USEPA. Since the mothballing of the refinery in 1981, the plant no longer generated DAF float from petroleum refining operations. Now that a final decision has been made not to resume petroleum refining at Wood River, removal of the plant from the RCRA system becomes appropriate and desirable. To do this, we understand that we must go through a RCRA closure, even though the plant continues to operate. Pursuant to your instructions to E. J. Sullivan in a telephone conversation on February 17, 1984, we will describe the events that occurred at the wastewater plant following suspension of petroleum refining operations, and request that you consider this letter to be our closure plan.

To aid in following the sequence of events, some background information will be helpful. The total Amoco facility in Wood River comprises three parcels of land: 1) the refinery site, 2) the main office-wastewater treating plant site, and 3) the riverfront site. Each site has interim status under RCRA and has its own ID number. Prior to October 1, 1981, Amoco Oil Company conducted all operations connected with the facility. With the exception of additive manufacturing units and ancillary operations that are owned by Amoco Chemicals Corporation, Amoco Oil Company owned all of the Wood River property.

RECEIVEDMAR 02 1984 *set*EPA - DLPC
STATE OF ILLINOIS

Mr. Larry Eastep, P.E.

Page 2

and equipment. Since 1981, certain segments of real estate, both improved and otherwise, have been donated or exchanged for other property.

Prior to 1977, wastewater treating facilities were located on the riverfront site and consisted of a series of aerated and non-aerated lagoons. New NPDES effluent discharge limitations that became effective on July 1, 1977, were more stringent than earlier limits and could not be complied with using existing facilities. Accordingly, construction of a new wastewater treatment facility began in 1976 and was put into operation in August, 1977. The former treatment lagoons became storm-water surge ponds. The new treatment sequence included: 1) clarification with dissolved air flotation, 2) mixed media filtration, 3) bio-oxidation with activated sludge, 4) clarification, and 5) final filtration. The plant also had an aerobic digester and belt filters for dewatering waste solids.

Until 1981, the new wastewater treatment plant served the combined petroleum refining and additive manufacturing operations. In early 1981, Amoco Oil Company announced a decision to suspend petroleum refining operations at Wood River. By June 1, 1981, all refining units had been shut down and placed in standby condition. Except for a petroleum terminaling function, operation and administration of the Wood River facility was officially turned over to Amoco Chemicals Corporation on October 1, 1981.

In November, 1980, two storage tanks, two belt presses, and two containers for dewatered solids became hazardous waste facilities because DAF float was stored and treated in this equipment. The USEPA defined DAF float from petroleum refining as a hazardous waste and identified it as K048. A copy of the Part A of the RCRA permit application that was filed in 1980 is attached as Appendix A.

The entire wastewater plant is enclosed with a chain-link fence with pedestrian and vehicle access gates. The fence also encloses an adjacent petroleum product storage tank field. Warning signs were posted to meet requirements for interim status. An operator is on duty 24 hours a day, 7 days a week.

Hazardous waste management at this site consisted of storage and treatment (dewatering) of DAF float. DAF float was generated in the inlet clarifier-dissolved air flotation unit and skimmed into and accumulated in Tank T-202. When this tank was filled, the DAF float was pumped either to the riverfront surge ponds for storage or to Tank T-1001, the belt filter feed tank. From T-1001, the DAF float, either alone or mixed with waste-activated sludge, was pumped to one of the belt filters for dewatering. Separated water recycled to the treating plant feed sump. Solids were discharged to a roll-off trailer box. When the box was filled, the dewatered solids were disposed of in a hazardous waste landfill. Most of the DAF float was impounded in the surge ponds, because its high oil content made it difficult to dewater.

Beginning June 1, 1981, with the suspension of petroleum refining operations, the DAF float, generated at the wastewater plant was no longer a hazardous waste by definition; it was hazardous only if it

RECEIVED
MAR 02 1984
E.P.A. - D.L.P.C.
STATE OF ILLINOIS

Mr. Larry Eastep, P.E.
Page 3

had one of the four prescribed hazardous waste characteristics. It also had a much lower oil content than it had during petroleum refining operations and became more amenable to dewatering on the belt presses. Dewatering of DAF float was continued, and the first full box of dewatered solids was sampled on August 17, 1981. The sample was taken from the surface of the solids in the box, so that it represented the last discharge from the belt press. The sample was then submitted to Environmental Analysis, Incorporated, in St. Louis, to be tested for the four hazardous waste characteristics. The analysis, a copy of which is attached as Appendix B, showed that the solids did not have any of the four characteristics of a hazardous waste. A copy of the analysis was furnished to Midwest Sanitary Service, who were requested to apply for a supplemental permit for disposal of the non-hazardous solids.

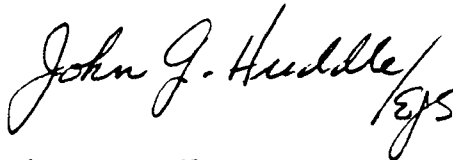
While this application was being processed, dewatered solids continued to be disposed of as a hazardous waste. Between August 20 and November 18, 1981, this amounted to a total of 10 boxes of solids. The nonhazardous DAF float was being generated at a rate of about 12,000 gallons/day, so we estimate that about 55 volumes passed through T-202 and 12 to 15 volumes through T-1001 during this same period.

After receipt of the supplemental permit classifying the dewatered solids as non-hazardous, disposal as a special waste to a nonhazardous landfill was initiated. A copy of the supplemental permit is attached as Appendix C.

Upon your acceptance of this letter as our closure plan, we will proceed to arrange for certification of closure. We estimate the cost of certification will be about \$3,000. Since this was not a disposal facility, and no hazardous waste remains on-site, no post-closure care is required.

If you have any questions or require further information, please contact E. J. Sullivan at 312/856-5858.

Yours truly,

A handwritten signature in cursive script that reads "John G. Huddle" followed by a stylized "EJS" monogram.

John G. Huddle
Director, Environmental Control
and Planning
Mail Code 1203

EJS/dmk

Attachments

RECEIVED

MAR 02 1984

E.P.A. - D.L.P.C.
STATE OF ILLINOIS

1 **EPA**

GENERAL INFORMATION
Consolidated Permit Program
Read the General Instructions before starting

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VII. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

EPA ID NUMBER
EIL0006272629

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully. If any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VII (except VII-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for data and item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	ANSWER			SPECIFIC QUESTIONS	ANSWER		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)			
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)				F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)			

III. NAME OF FACILITY

1 SKIPIA MOORE OIL MAIN OFFICE AND WATER TREAT

IV. FACILITY CONTACT

A. NAME & TITLE (Name, Title, & Title)

2 E. J. SULLIVAN CONSULT. ENV. CNTRL. 612 251 0049

B. PHONE (Area Code & No.)

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 BOX 192

B. CITY OR TOWN

4 WOOD RIVER

C. STATE D. ZIP CODE

IL 62295

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 620 SOUTH MAIN STREET

B. COUNTY NAME

6 MADISON

C. CITY OR TOWN

6 WOOD RIVER

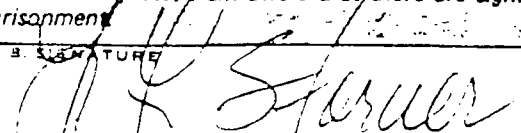
D. STATE E. ZIP CODE F. COUNTY CODE

IL 62295

RECEIVED

MAR 02 1984

E.P.A. — D.L.P.C.
STATE OF ILLINOIS

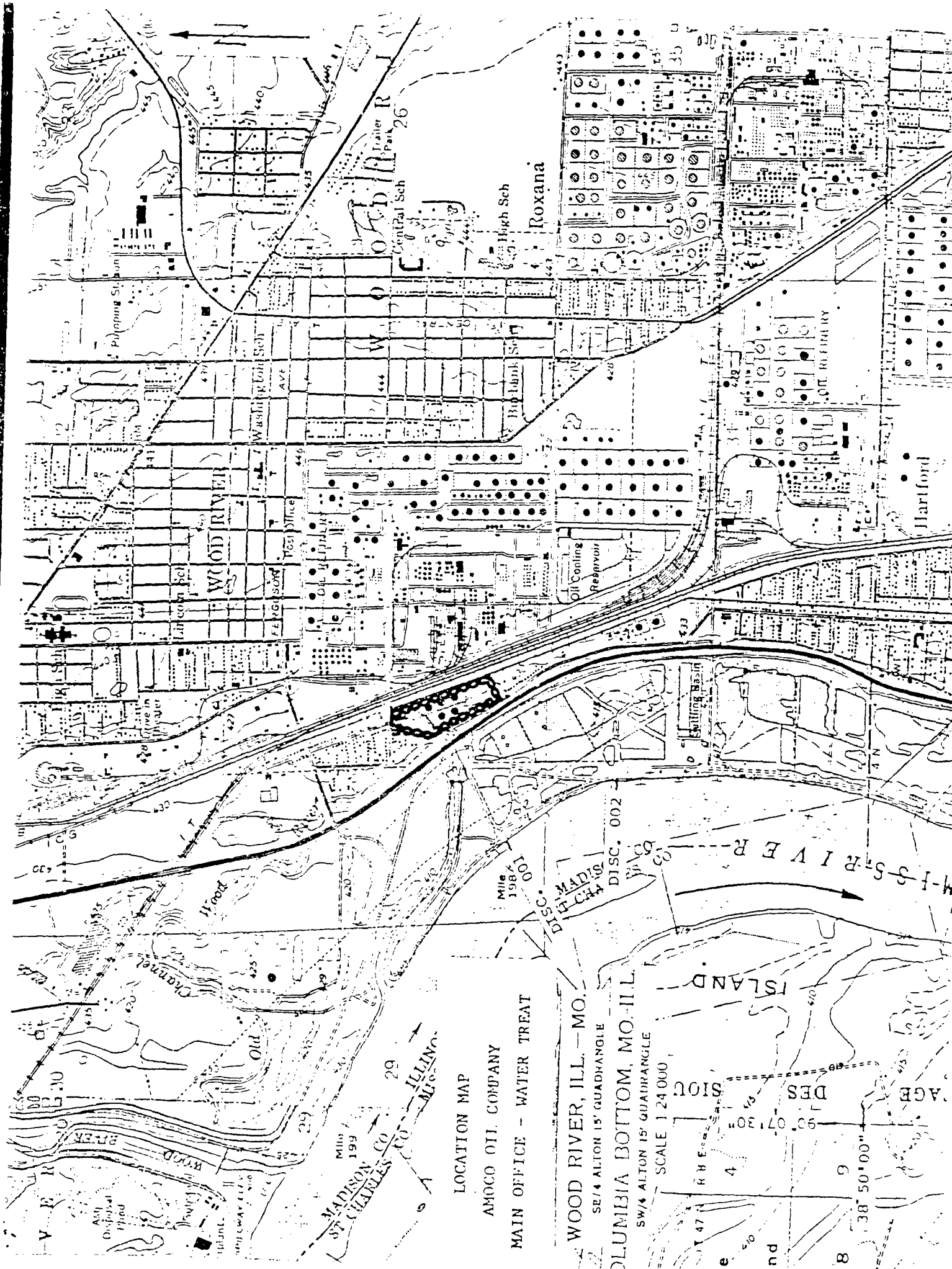
VII. SIC CODES (4-digit, in order of priority)																																																					
A. FIRST						B. SECOND																																															
7 2 9 1 1 (specify) PETROLEUM REFINING						7 2 8 6 9 (specify) ADDITIVE MANUFACTURING																																															
C. THIRD						D. FOURTH																																															
7 NA (specify)						7 NA (specify)																																															
VIII. OPERATOR INFORMATION																																																					
A. NAME											B. Is the name listed Item VIII-A also owner?																																										
8 AMOCO OIL COMPANY											<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO																																										
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																																																					
F = FEDERAL M = PUBLIC (other than federal or state) P (specify) S = STATE O = OTHER (specify) P = PRIVATE																																																					
D. PHONE (area code & no.)																																																					
A 3 1 2 8 5 6 5 1 1 1																																																					
E. STREET OR P.O. BOX																																																					
2000 E EAST RANDOLPH DRIVE																																																					
F. CITY OR TOWN																																																					
8 CHICAGO																																																					
G. STATE																																																					
IL																																																					
H. ZIP CODE																																																					
6 0 6 0 1																																																					
IX. INDIAN LAND																																																					
Is the facility located on Indian lands?																																																					
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO																																																					
X. EXISTING ENVIRONMENTAL PERMITS																																																					
A. NPDES (Discharges to Surface Water)						D. PSD (Air Emissions from Proposed Sources)																																															
9 N I L 0 0 0 0 0 3 5						9 P NA																																															
B. UIC (Underground Injection of Fluids)						E. OTHER (specify)																																															
9 U NA						9 NA (specify)																																															
C. RCRA (Hazardous Wastes)						E. OTHER (specify)																																															
9 R NA						9 NA (specify)																																															
XI. MAP																																																					
Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.																																																					
XII. NATURE OF BUSINESS (provide a brief description)																																																					
THE REFINING OF CRUDE PETROLEUM INTO FUEL GAS, LPG, PROPYLENE CONCENTRATE, MOTOR GASOLINES, JET FUELS, KEROSENE, DIESEL FUEL, FURNACE OIL, POLYBUTENES, RESIDUAL FUELS, INDUSTRIAL ASPHALTS, AND PAVING ASPHALTS. ALSO MANUFACTURED ARE ADDITIVES FOR LUBRICATING OILS, FUEL OILS, AND GASOLINES. THIS FACILITY CONTAINS OFFICES, STORAGE TANKS, AND WASTEWATER TREATING FACILITIES ASSOCIATED WITH THE REFINING OF PETROLEUM IN THE REFINERY PROPER.																																																					
XIII. CERTIFICATION (see instructions)																																																					
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.																																																					
A. NAME & OFFICIAL TITLE (type or print)						B. SIGNATURE			C. DATE SIGNED																																												
J. F. HORNER, VICE PRESIDENT REFINING AND ENGINEERING									11/18/80																																												
COMMENTS FOR OFFICIAL USE ONLY																																																					
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:5%;">C</td> <td style="width:15%;">1</td> <td style="width:15%;">2</td> <td style="width:15%;">3</td> <td style="width:15%;">4</td> <td style="width:15%;">5</td> <td style="width:15%;">6</td> <td style="width:15%;">7</td> <td style="width:15%;">8</td> <td style="width:15%;">9</td> <td style="width:15%;">10</td> <td style="width:15%;">11</td> <td style="width:15%;">12</td> <td style="width:15%;">13</td> <td style="width:15%;">14</td> <td style="width:15%;">15</td> <td style="width:15%;">16</td> <td style="width:15%;">17</td> <td style="width:15%;">18</td> <td style="width:15%;">19</td> <td style="width:15%;">20</td> </tr> <tr> <td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </table>												C	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20																					
C	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20																																	

RECEIVED

MAR 02 1984

EPA - D.L.P.C.

STATE OF ILLINOIS



LOCATION MAP

AMOCO OIL COMPANY

MAIN OFFICE - WATER TREAT

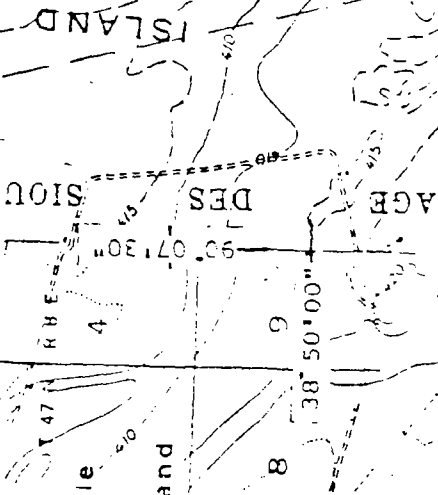
WOOD RIVER, ILL.-MO.

SE 1/4 ALTON 15' QUADRANGLE

CLUMBIA BOTTOM, MO.-ILL.

SW 1/4 ALTON 15' QUADRANGLE

SCALE 1:24,000





HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 2002 of RCRA.)

EPA ID NUMBER

EPA ID NUMBER 15-20101016272629

FOR OFFICIAL USE ONLY

APPLICATION DATE RECEIVED

APPROVED

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or revised application. If this is your first application and you already know your facility's EPA ID Number, or if this is a revised application, enter your facility's EPA ID Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (see instructions for definition of "existing" facility.)☒ Exact Day and Month Unknown

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

☐ 2. NEW FACILITY (Complete item below)

FOR NEW FACILITY, PROVIDE THE DATE

OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete item I above)

☐ 1. FACILITY HAS INTERIM STATUS☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS		T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	SURFACE IMPOUNDMENT		
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR GALLONS PER HOUR OR LITERS PER HOUR
Disposal:			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or inciner- ators. Describe the processes in the space provided. Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C		DUP		T/A/C		1			
12		13		14		15			
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEA- SURE (enter code)				1. AMOUNT	2. UNIT OF MEA- SURE (enter code)	
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 2	53,000	G		7				
2	S 0 1	6,000	G		8				
3	T 0 4	2,400	H		9				
4					10				

RECEIVED

MAR 02 1984

E.P.A. - D.L.P.C.
STATE OF ILLINOIS

LINE 3

T04 - BELT-PRESS DEWATERING OF DAF FLOAT

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart C for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

3. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Notes: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	<div style="text-align: center;"> RECEIVED MAR 02 1984 E.P.A. — D.L.P.C. STATE OF ILLINOIS <i>included with above</i> </div>
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
W I L D 006272629										W DUP									

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES											
				1. PROCESS CODES (enter)						2. PROCESS DESCRIPTION (if a code is not entered in D1:)					
1	K 0 4 8	40,000	T	S 0 2	T 0 4										DEWATERING
2	K 0 4 8	15,000	T	S 0 1											
3															
4															
5															
6															
7															
8															
9															
10															
11															
12															
13															
14															
15															
16															
17															
18															
19															
20															
21															
22															
23															
24															
25															
26															

RECEIVED

MAR 02 1984

E.P.A. — D.L.P.C.
STATE OF ILLINOIS

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F 1 2 0 0 4 2 7 2 6 2 9 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

38 51 01 3

090 06 00 6

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

E NA

NA

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

F NA

G NA

NA

NA

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

J. F. HORNER, VICE PRESIDENT
REFINING AND ENGINEERING

J. F. Horner

11/18/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

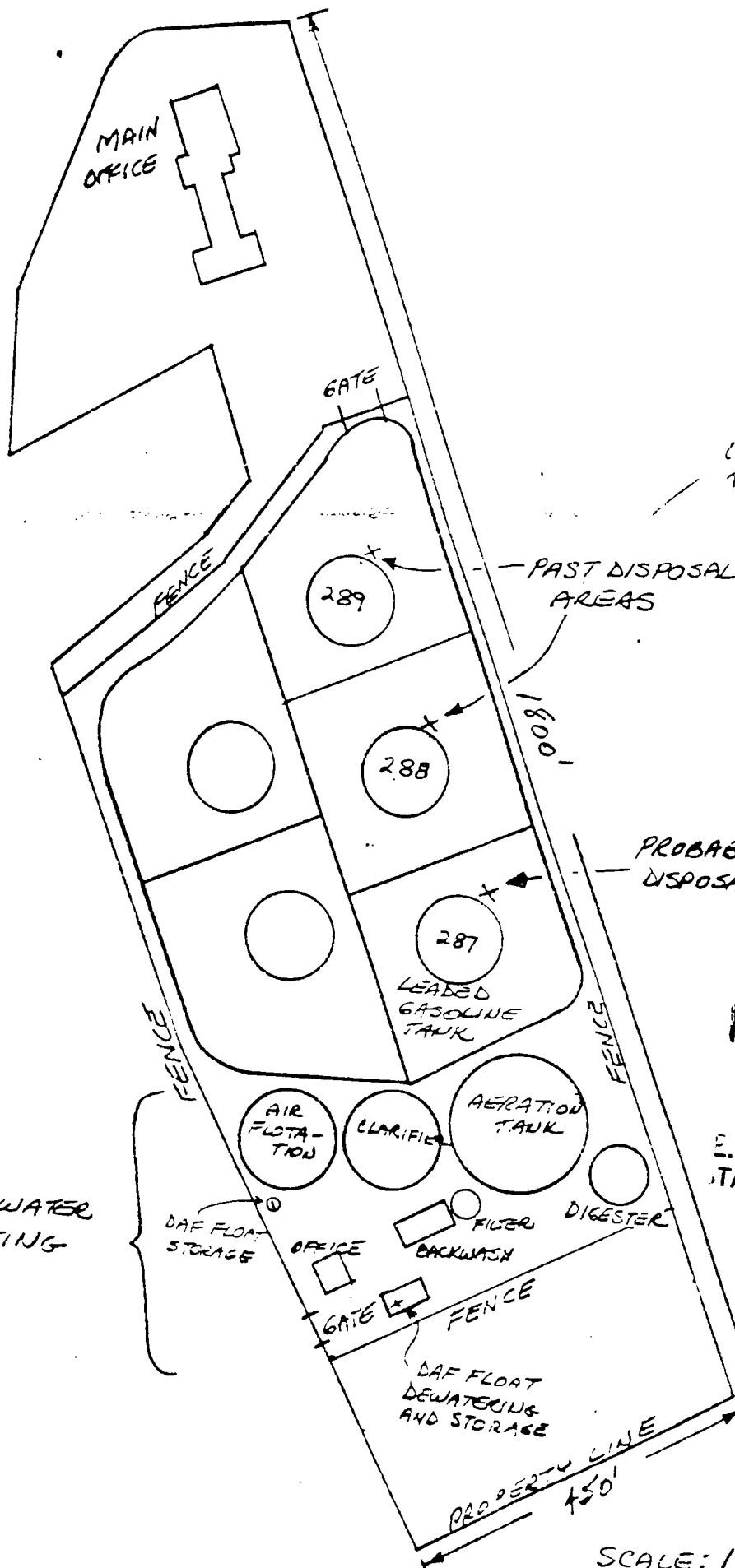
B. SIGNATURE

C. DATE SIGNED

NA

MAR 02 1984

NA



LEADED
TANK BOTTOMS

PAST DISPOSAL
AREAS

PROBABLE PAST
DISPOSAL AREA

RECEIVED

MAR 02 1984
E.P.A. - D.L.P.C.
STATE OF ILLINOIS

WASTEWATER
TREATING

DAF FLOAT
STORAGE

OFFICE

FIBER
BACKWASH

DIGESTER

DAF FLOAT
DEWATERING
AND STORAGE

PROPERTY LINE
450'

SCALE: 1" = 200'

4-19-80

54-10



3353 PARKER SPUR
FLORISSANT, MO 63033

PHONE
1-314-921-4488

FILE

ENVIRONMENTAL
ANALYSIS
INC.

Date: Sept. 1, 1981
Report No. 8269
P.O. No. 802-9-20186
Lab. No. 151-17

Mr. C. Bartels
AMOCO OIL COMPANY
Post Office Box 182
400 South Main Street
Wood River, Illinois 62095

REPORT OF ANALYSIS

Subject: Analysis performed in accordance with the Resource Conservation and Recovery Act 40 CFR; 261.23, Characteristic of Reactivity, 261.21, Characteristics of Ignitability, 261.22, Characteristics of Corrosivity and 261.24, Characteristics of EP Toxicity and Standard Methods for the Examination of Water and Wastewater, 14th Edition, 1975.

Sample Identification: Sample marked as: Pressed sludge WWTP "B" Press Dumpster Bx, dated 8-17-81.

Results of Analysis:

(I) Characteristics of Reactivity (261.23 (a) (2); (5)

Soluble Cyanide, ug CN/g	< 0.01
Total Cyanide, ug CN/g	< 1.0
Soluble Sulfide, ug S/g	0.03
Total Sulfide, ug S/g	650

(II) Characteristics of Ignitability (261.21)

Flash Point (P-M), F	> 210
------------------------	-------

(III) Characteristics of Corrosivity (261.22)

pH of 10% Solution	7.63
--------------------	------

(1)

RECEIVED

MAR 02 1984

E.P.A. — D.L.P.C.
STATE OF ILLINOIS

ANALYTICAL CHEMISTRY - RESEARCH - FIELD STUDIES

3363 PARKER SPUR
FLORISSANT, MO 63033

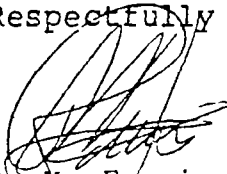
PHONE
1-314-921-4488

ENVIRONMENTAL
ANALYSIS
INC.

(IV) Characteristics of EP Toxicity (261.24 (a))

Arsenic, mg As/l	0.012
Barium, mg Ba/l	12.0
Cadmium, mg Cd/l	< 0.001
Chromium, mg Cr/l	0.031
Copper, mg Cu/l	0.038
Lead, mg Pb/l	0.93
Mercury, mg Hg/l	< 0.005
Silver, mg Ag/l	0.023
Selenium, mg Se/l	< 0.001

Respectfully submitted,



R. M. Ferris,
Director, EAI

RECEIVED

MAR 02 1984

E.P.A. - D.L.P.C.
STATE OF ILLINOIS

D.L.P.C. COMPLAINT INVESTIGATION FORM

C-79-69-S

MADISON CO. - 119 11501
HARTFORD 1 AMOCO ()
Date Received 3-27-79 By K. MENSLING By Phone In Person By Mail
Complainant NORRIS EICHLER Respondent AMOCO OIL CO.
Address SCA SERVICES Address _____
Telephone _____ Telephone Ed Sullivan - 254-7351

Directions To Source WEST OF HARTFORD, NEXT TO RIVER.
Complaint Details AMOCO HAS SUPPLEMENTAL PERMIT AT ROXANA/SCA-BART
BUT QUIT TAKING SLUDGE WASTE THERE ON JAN. 1, 1979.
EICHLER SAID HE HAD HEARD THAT IT IS BEING DEPOSITE
BETWEEN LEVEE AND RIVER AT HARTFORD

INVESTIGATION FINDINGS

Date 9/21/79 Time 1:30 pm By David Wietes
Interviewed R.S. McDaniel (M.E. Eng. Con) Weather 70° Dry - Cldy Photos NO
Ed Sullivan (Consult. Eng. Con)
Violations Observed Special wastes from Amoco's refinery are being
dumped between the levee and Mississippi River near their
water treatment lagoons. General construction waste is also
being dumped but should be acceptable under 21(c).
Respondent's Remarks The dumping area is protected by levees from
flooding. Amoco is reluctant to submit a permit application
until the Federal E.P.A. finalizes its rules and regs. on
special/azardous wastes.

RECEIVED

FOLLOW-UP ACTION

Refer To _____

File Opened

Yes

No

E.P.A. - D.L.P.C.
STAT. 101-103

Amoco has been notified of problem by letter and urged
to arrange a meeting w/ the permit section.



Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62766

217/782-6762

Refer to: 11911501 -- Madison County
Wood River/AMOCO Main Office and Wastewater Treating Plant
ILD 006272629

March 23, 1984

AMOCO Oil Company
200 East Randolph Drive
P.O. Drive 6110-A
Chicago, IL 60680

Dear Mr. Huddle:

This letter is in response to your closure plan for the above referenced facility submitted to the Agency on February 28, 1984 and received on March 2, 1984.

Because of deficiencies in your closure plan which are enumerated hereafter the Agency is requesting that you supplement the information originally submitted with your closure plan within thirty (30) days of receipt of this letter. All references are to Subtitle G, 35 Ill Admin. Code, Part 725.

As the Part A for the above referenced facility includes all the property described by the facility drawing on page 5 of the application, all hazardous waste management operations that occurred on this property need to be addressed in the closure plan. From the information available, it appears that this would include at least the following:

1. DAF float storage tank T-202
2. DAF float belt filter feed tank T-1001
3. The belt filters
4. Container storage area(s)
5. Any spills or leaks that occurred on the property.

Documentation submitted to date is incomplete and does not satisfy the requirements of 725.211. The following deficiencies need to be addressed:

1. An estimate of the maximum inventory of wastes in storage and treatment at any time during the life of the facility [725.212(a)(2)].

RECEIVED

MAR 30 1984

OFFICE OF
J. G. HUDDLE

RECEIVED

APR 20 1984

E.P.A. — D.L.P.C.
STATE OF ILLINOIS

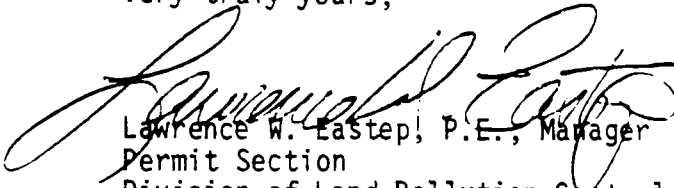


Page 2

2. A description of the steps needed to decontaminate facility equipment during closure [725.212(a)(3)] must include all tanks, pumps and piping; the belt filters; and containment structures [725.214] [725.297].
3. An estimate of the expected year of closure and a schedule for final closure. [725.212(a)(4)].
4. A description of how the known and probable past disposal areas will be closed in such a way to comply with [725.211(b)].
5. Please provide an outline of the closure cost estimate that indicates the costs of the individual closure activities and how these costs are derived. [725.242(a)]

The Agency does not deem this request for supplemental information to be a disapproval for administrative purposes under Subtitle G, Section 725.212(d). However, a failure to submit the information within 30 days of this letter may render your plan subject to disapproval.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:WRW/maw/0644d/4-5

cc: Southern Region
Division File
Compliance Assurance

RECEIVED

APR 20 1984

E.P.A. — D.L.P.C.
STATE OF ILLINOIS



April 19, 1984

Amoco Oil Company

200 East Randolph Drive
Post Office Box 6110-A
Chicago, Illinois 60680

Certified Mail P454-431-129
Return Receipt Requested

Mr. Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Local Pollution Control
Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Dear Mr. Eastep:

Amoco Waste Water Treating Plant—Main Office Site; ILD 006272629

Please refer to your March 23, 1984 request for supplemental information pertaining to closure of Amoco's Waste Water Plant—Main Office Site (ILD 006272629) in Wood River, as described in our February 25, 1984 letter.

The items of equipment involved in hazardous waste management, as stated in your letter are:

Tank T-202 DAF float storage
Tank T-1001 belt filter feed tank
Two Bellmer Winkelpresse belt filters
Two roll-off trailer boxes
The storage area for the trailer boxes
Spills and leaks

The items enumerated in your letter are addressed in the following paragraphs:

- 1) 725.212(a)(2): During the life of the facility, Tank T-202 could have contained as much as 38,000 gallons of DAF float. Tank T-1001 was typically limited to a volume of 15,000 gallons of waste. The belt presses were for treating (dewatering) and contained no inventory. The roll-off trailer boxes were limited because of weight restrictions, to 15 cubic yards each. It is possible that during the life of the facility, a maximum of 30 cubic yards of dewatered solids could have been in inventory at one time.
- 2) 725.212(a)(3), 725.214, 725.297: We estimate that 5 to 10 million gallons of nonhazardous DAF float have passed through this system since November 1981 when the dewatered solids were classified nonhazardous. Lines and pumps have to be considered decontaminated because of the length of time that the inside surfaces were subjected to the turbulent,

RECEIVED

APR 20 1984

**E.P.A. — D.L.P.C.
STATE OF ILLINOIS**

scouring action of this volume of fluid. This conclusion is borne out by periodic tests on dewatered solids that continue to show they are nonhazardous.

Decontamination of tanks will consist of first emptying the tanks as far as possible, and then sampling and testing the residues on the bottoms and sides of the tanks. If tests show the residues are nonhazardous, the tanks will be deemed to be decontaminated. If tests show that the residues are hazardous, all fluid material will be removed, solidified, and disposed of in a hazardous waste landfill. The inside surfaces will then be cleaned using detergent, brushes, and rags. All liquids resulting from the cleaning will be solidified, combined with other solids, and disposed of in a hazardous waste landfill.

Decontamination of the belt filters will consist of compositing scrapings of residues from the filter frames and supporting structure; the belts are automatically washed clean during the filtering operation. The scrapings will be tested, and, if found to be nonhazardous, the belt filter installation will be considered to be decontaminated. If the scrapings are shown to be hazardous by test, the filter frames and support structure will be cleaned using detergent, brushes, and rags, and the cleaning wastes will be disposed of in a hazardous waste landfill after solidifying any liquids.

Scrapings will be composited from the inside and outside of each roll-off trailer box, separately. Scrapings will also be taken from the surrounding floor area around each box. The four samples will be tested, and, if found to be nonhazardous, the boxes and surrounding areas will be deemed to be decontaminated. If any of the four samples are hazardous by test, the corresponding box or area will be cleaned with detergent, brushes, and rags, and the cleaning wastes disposed of in a hazardous waste landfill after solidifying any accumulated liquid.

The areas around the two storage tanks will be examined for evidence of spills, especially under the DAF float conveyor between the inlet clarifier and T-202. Scrapings will be taken from any spills on the concrete around T-1001 or the ground around T-202 and tested. If tests show the spilled material to be nonhazardous, no further action will be taken. If the scraping from the concrete is hazardous by test, the concrete will be cleaned using detergent, brushes, and rags, and the cleaning wastes disposed of in a hazardous waste landfill. If the soil scraping is hazardous by test, all obvious non-soil material will be excavated along with 1" to 2" of soil and disposed of as hazardous waste. A second scraping will be made of the exposed soil in the spill area and will be submitted for testing. If the sample is hazardous by this test, the process will be repeated, removing an additional 1" to 2" soil each time until a scraping is no longer hazardous by test. At this point, the excavation will be backfilled if deep; otherwise, the area will be levelled without backfilling.

RECEIVED

APR 20 1984

E.P.A. — D.L.P.C.
STATE OF ILLINOIS

- 3) 725.212(a)(4): Closure is planned in 1984. A schedule of closure activities is shown below:

<u>Activity</u>	<u>Days After Approval of Closure Plan for Completion</u>
Complete sampling	15
Complete testing	60
Resample and retest (if required)	120
Certification	180

- 4) 725.242(a): The estimated cost of closure is \$8,500 which was calculated as shown below.

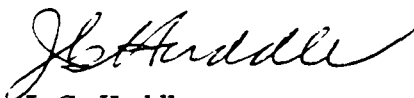
Travel expenses for sampling, including consultant	\$1,060
Testing ten samples	1,400
Resampling, retesting 50 percent of samples	1,540
Disposal	1,500
Certification	3,000
Total	<u>\$8,500</u>

We have not addressed the past disposal areas in the adjoining tank field in this closure plan because those sites, known and probable, were reported as Superfund sites in 1981 as required by CERCLA. We feel that the investigation, evaluation, and remedial action, if any, for those sites are separate issues that are not properly part of a RCRA closure plan. These sites were never regulated under RCRA because they were inactive when RCRA regulations became effective on November 19, 1980. We will be pleased to meet with you at your convenience to develop a program to evaluate these sites and to devise a remedial action plan if one is required.

It may be of value to know that, although Amoco has donated the main office building to a nonprofit Madison County organization and has donated the waste water treating plant to the city of Wood River, Amoco will retain ownership of the tank field where the past disposal sites are located. The city, incidentally, has not yet assumed operation of the waste water treating plant.

Please let us know if you require further information.

Yours truly,



J. G. Huddle
Director, Environmental Control and Planning
Mail Code 1203

JGH/cad

RECEIVED

APR 20 1984

E.P.A. — D.L.P.C.
STATE OF ILLINOIS